

JUDGE'S COPY
UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

KIM SMITH : CIVIL ACTION NO. 1:01-0817
PLAINTIFF : (Caldwell, J)
VS. : (Mannion, M.J.)
JAMES MORGAN et al., :

FILED
HARRISBURG

MOTION TO COMPEL DISCOVERY

JUN 18 2001

MARY E. D'ANDREA, CLERK
Per *S. J. H.*
DEPUTY CLERK

AND come plaintiff Kim Smith a lay person not lettered in legal matters without the aid of counsel, moves and prays that a less stringent standard be applied to this pro-se pleading for discovery of the appeals, of misconduct, and grievances to prove and show the exhaustion of administrative remedies have been exhausted. As it is staff in this institution has failed to reply to appeals in the last 90 days also appeal sent to Camp Hill I have not gotten a reply to for any of the grievances filed or appeals. I the were sent institutional staff in the RHU failed to provide me with such, at this time I only have the numbers such was filed under and a discovery is required to address all allegation in the 1983 claim for civil rights violation and 8th, amendment violation.

It is respectfully requested that a Court order be issued to have the below listed parties provide me with the requested information.

KANDIS DASCANI Grievance Officer S.C.I. Coal Township 1 Kelly Dr. Coal Township Pa.
17866-1021

Grievance Numbers 0062-01, 0071-01, 0072-01, 250-01, 282-01, 0108-01, 0062-01, 0342-01.
SHARON BURKS S.C.I Smithfeold Grievance Officer P.O. Box 999, 1120 Pike St. Huntingdon
Pa. 16652.

Grievance Numbers, 353-01, 417-00, 413-00, 0353-00, 032-00, 326-98, 419-98, 030-00.

Also to have Tshanna C. Kyler Administrative Assistant Commonwealth of Pennsylvania Department of Correction 2520 Lisburn Rd. P.O. Box 598 Camp Hill Pa 1701-0598, provide me with all copies of the above listed and any filed since July 1995 to this date and all formal responses on all the grievances and on all misconducts that appeals were filed namely misconduct number 875160, in which I never got any reply to the 6 appeals I filed while in RHU.

This information is needed to better state a claim and support allegations of abuse within. Pro-se petitioner can not adequately present this case without this requested information. This information is needed to comply with the May 10, 2001 order by this honorable Court.

RESPECTFULLY SUBMITTED



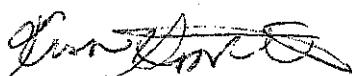
PROOF OF SERVICE

And now this 15 day of June, 2001 a true and correct copy of this motion was forwarded to the below listed parties, by turning legal mail over to D Block officers to mail to institutional mail room to be processed and forwarded to the United States Postal Service, for mailing.

CLERKS OFFICE
U.S. DISTRICT COURT
228 N. WASHINGTON AVE
P.O. BOX 983
HARRISBURG, PA. 17108

KIM SMITH

WARDEN GILLIS
WARDEN MORGAN



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